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The Honorable Charles L.A. Terreni

Chief Clerk

South Carolina Public Service Commission

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RE: Application of Zeus Telecommunications, LLC for a Certificate of Public Convenience and Necessity to Provide Resold Intrastate Interexchange Telecommunications Services Within the State of South Carolina
Docket No. 2006-148-C, Our File No. 1180-11371

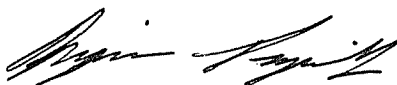
Dear Mr. Terreni:

Enclosed is the **Testimony of Thomas H. Ong** filed on behalf of Zeus Telecommunications, LLC in the above-referenced docket.

Please acknowledge your receipt of this document by file-stamping the copy of this letter enclosed, and returning it in the enclosed envelope.

If you have any questions or need additional information, please do not hesitate to contact me.

Very truly yours,



Benjamin A. Traywick

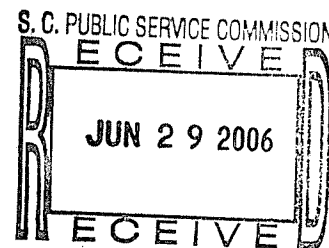
BAT/cr

cc: Wendy B. Cartledge, Esquire

Mr. Thomas H. Ong

Monica Borne Haab, Esquire

Enclosures



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**BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2006-148-C**

In the Matter of:)
APPLICATION OF ZEUS TELECOMMUNICATIONS, LLC)
FOR A CERTIFICATE OF PUBLIC CONVENIENCE)
AND NECESSITY TO PROVIDE RESOLD INTRASTATE)
INTEREXCHANGE TELECOMMUNICATIONS)
SERVICES WITHIN THE STATE OF SOUTH CAROLINA)

**TESTIMONY OF THOMAS H. ONG
ON BEHALF OF
ZEUS TELECOMMUNICATIONS, LLC**

1 **Q: PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A: My name is Thomas H. Ong, and my business address is 512 Lake Village Drive,
3 McKinney, Texas 75071.

4 **Q: BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A: I am the Manager of Zeus Telecommunications, LLC ("Zeus").

6 **Q: IS THE ADDRESS OF THE COMPANY THE SAME AS THAT WHICH YOU**
7 **HAVE JUST SUPPLIED?**

8 A: Yes.

9 **Q: PLEASE DESCRIBE YOUR DUTIES FOR THE COMPANY.**

10 A: I am in charge of handling the Company's regulatory and compliance operations, for
11 acting as liaison with governmental agencies, and for overseeing all operations of the
12 company.

13 **Q: COULD YOU PROVIDE A BRIEF BACKGROUND OF YOUR EDUCATION**
14 **AND EXPERIENCE?**

1 A: I graduated from the University of Montana with a Bachelor of Science in
2 Business/Management and Marketing. I am the president of Ong, Inc., which is a
3 telecommunications consulting and brokering firm. This firm participates in a wide
4 variety of telecommunications endeavors. I am the Managing Partner of Direct Connect
5 International, LLC and Zeus Telecommunications, LLC. Direct Connect is a wholesaler
6 in the prepaid telecommunications industry and Zeus is a long distance wholesaler. I am
7 also the president of STS Consulting, a master agent for long distance provider servicing
8 small to medium size businesses.

9 **Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

10 A: The purpose of my testimony is to present evidence describing the technical, managerial
11 and financial fitness of Zeus to provide resold interexchange services in South Carolina.
12 This testimony will also describe the services to be provided by Zeus and the Company's
13 proposed tariff. Finally, my testimony will show that the public interest will be served by
14 approval of Zeus's application.

15 **Q: ARE YOU FAMILIAR WITH THE APPLICATION OF YOUR COMPANY**
16 **SUBMITTED TO THIS COMMISSION AND ALL EXHIBITS ATTACHED**
17 **THERE TO?**

18 A: Yes.

19 **Q: DO YOU WISH TO INCORPORATE BY REFERENCE ANY DOCUMENTS**
20 **INTO THIS TESTIMONY?**

21 A: Yes. I wish to incorporate by reference the underlying Application filed in this
22 proceeding and its associated exhibits.

1 **Q: DO YOU RATIFY AND CONFIRM THE STATEMENTS AND**
2 **REPRESENTATIONS MADE IN THAT APPLICATION AND ALL EXHIBITS**
3 **ATTACHED THERETO?**

4 A: Yes.

5 **Q: HAS ZEUS REGISTERED TO DO BUSINESS IN SOUTH CAROLINA?**

6 A: Yes. Zeus has received foreign corporation authority in South Carolina, and a copy of
7 the Certificate of Authorization was attached to the Application as Exhibit B.

8 **Q: PLEASE DESCRIBE THE SERVICES THAT THE COMPANY INTENDS TO**
9 **PROVIDE WITHIN THE STATE OF SOUTH CAROLINA.**

10 A: The company seeks authority to operate as a reseller of intrastate interexchange
11 telecommunications services to the public on a statewide basis. Specifically, Zeus
12 proposes to offer traditional switched long distance service, toll-free services, and post-
13 paid calling card services.

14 **Q: DOES THE COMPANY INTEND TO OFFER PREPAID DEBIT CARD**
15 **SERVICES IN SOUTH CAROLINA?**

16 A: Not at this time. The Company is aware of this Commission's \$5,000 bond or certificate
17 of deposit requirement associated with prepaid debit card services, and will file such an
18 instrument with the Commission should the Company decide to offer these services in the
19 future.

20 **Q: WHICH CARRIERS CURRENTLY SERVE AS THE COMPANY'S**
21 **UNDERLYING CARRIERS?**

1 A: Qwest and/or Global Crossing. The Company can assure the Commission that any
2 carrier with whom the company contracts for the provision of interexchange services will
3 have been properly certified by this Commission.

4 **Q: WHAT SERVICES DOES THE UNDERLYING CARRIER(S) PROVIDE TO THE**
5 **COMPANY?**

6 A: The underlying carriers provide the Company's long distance interexchange services.

7 **Q: HOW DOES THE COMPANY RESELL INTEREXCHANGE SERVICES?**

8 A: The Company purchases service at a discount from its underlying carriers, and then
9 resells the service under its own brand name to the public.

10 **Q: HOW WILL ZEUS BILL FOR ITS SERVICES?**

11 A: Calls are billed directly by the Company. The Company's customer bill will comply in
12 all respects with Commission Rule 103-622.1, and the Company will provide a copy of
13 its customer bill to the Commission as required by Commission Rule 103-612.2.2.

14 **Q: HOW ARE TROUBLE REPORTS AND CUSTOMER COMPLAINTS**
15 **HANDLED?**

16 A: Zeus uses a nationwide toll-free number, (800) 814-2919 for customer services. Live
17 Customer Service hours of operation are 8:30 a.m. to 5:30 p.m. (EST) Monday through
18 Friday. An emergency after-hours repair option is available by dialing the toll-free
19 Customer Service number above. The Company's toll-free number is printed on all
20 customer billing statements.

21 **Q: HOW ARE BILLING ERRORS AND COMPLAINTS HANDLED?**

22 A: The Customer Service Department is open from 8:30 a.m. to 5:30 p.m. (EST) Monday
23 through Friday by calling 1-800-814-2919 (toll- free). Customer service representatives

1 are prepared to respond to a broad range of service matters, including 1) the types of
2 services offered; 2) monthly billing statements; 3) problems or concerns pertaining to a
3 customer's current service; and 4) general telecommunications matters.

4 **Q: ARE YOU FAMILIAR WITH THE TARIFF SUBMITTED AS AN EXHIBIT TO**
5 **THE APPLICATION?**

6 A: Yes.

7 **Q: WAS THE TARIFF PREPARED BY YOU OR UNDER YOUR SUPERVISION?**

8 A: Yes. It was prepared under my supervision.

9 **Q: DESCRIBE THE PROPOSED ZEUS SOUTH CAROLINA TARIFF.**

10 A: Zeus has included a proposed interexchange tariff, which contains the rules, regulations
11 and rates for Zeus's services. Zeus proposes to resell interexchange services, including
12 traditional switched long distance, toll-free services, and post-paid calling card services.
13 These intrastate services are provided to both business and residential customers in
14 conjunction with interstate services. These services are not mileage-sensitive. Zeus's
15 tariff will comport with all applicable Commission Rules and Orders, and Zeus agrees to
16 make any changes suggested by the Commission Staff necessary to comply with all such
17 applicable authority.

18 **Q: IN YOUR OPINION, ARE YOUR PROPOSED RATES CONTAINED IN THE**
19 **TARIFF JUST AND REASONABLE?**

20 A: Yes. They are competitive in the current market.

21 **Q: WILL THE COMPANY PROVIDE ANY EQUIPMENT OR FACILITIES IN**
22 **CONNECTION WITH ITS SERVICES?**

1 A: No, the Company does not intend to own, operate, control or manage any
2 telecommunications transmission facilities within the State of South Carolina, and does
3 not intend to obtain or construct any such facilities or equipment. However, the
4 Company reserves the right to install its own facilities if and when business conditions
5 warrant, and upon approval of the Commission.

6 **Q: HOW LONG HAS THE COMPANY BEEN IN BUSINESS?**

7 A: Zeus Telecommunications, LLC was organized December 8, 2004. It is in the process of
8 obtaining authority to provide interexchange services in about thirty (30) states, and
9 intends to obtain interexchange certification on a nationwide basis.

10 **Q: DOES THE COMPANY HAVE OFFICES IN SOUTH CAROLINA?**

11 A: No. The company does not intend to have offices in South Carolina. Accordingly, the
12 company requests, pursuant to Commission Rule 103-610, that the Commission authorize
13 the company to keep its books and records at its offices in Texas. Upon request, the
14 company will provide any such books and records to the Commission and the Office of
15 Regulatory Staff on an expedited basis and at the company's expense.

16 **Q: DOES THE COMPANY HAVE ADEQUATE AND SUFFICIENT FINANCIAL**
17 **RESOURCES TO PROVIDE THE PROPOSED TELECOMMUNICATIONS**
18 **SERVICES PROPERLY AND CONTINUOUSLY?**

19 A: Yes. The Applicant is adequately funded for continuous operations. The Company
20 submitted financial statements reflecting its financial status as Exhibit D to the
21 Application.

22 **Q: WHERE DOES THE COMPANY ANTICIPATE OFFERING ITS SERVICES IN**
23 **SOUTH CAROLINA?**

1 A: The Company intends to offer its services on a statewide basis.

2 **Q: HOW WILL THE COMPANY MARKET ITS SERVICES?**

3 A: The Company will market its services by using independent agents and/or in-house sales
4 representatives. The Company does not intend to use telemarketing in connection with
5 its services.

6 **Q: IS THE COMPANY CERTIFIED OR OTHERWISE AUTHORIZED TO**
7 **PROVIDE RESALE SERVICES OF THE TYPE DESCRIBED HEREIN IN ANY**
8 **OTHER STATES?**

9 A: Yes. The Company is currently authorized to operate in Florida, Indiana, Kentucky,
10 Louisiana, Michigan, New York, North Carolina, Ohio, Oregon, Texas, and Wisconsin.

11 **Q: IN WHAT OTHER STATES WILL THE COMPANY SEEK WHATEVER**
12 **APPROVALS ARE NECESSARY?**

13 A: The Company intends to obtain certification on a nationwide basis.

14 **Q: WHY DOES THE COMPANY WANT TO COMMENCE OPERATIONS IN**
15 **SOUTH CAROLINA?**

16 A: The Applicant intends to operate on a nationwide basis.

17 **Q: IN YOUR OPINION, WHY IS THE COMPANY'S SERVICE IN THE PUBLIC**
18 **INTEREST?**

19 A: Allowing the Company to provide service within the State of South Carolina promotes
20 competition within the telecommunications industry, and thereby results in the offering of
21 higher quality services at lower prices to consumers.

22 **Q: IS THE COMPANY WILLING AND ABLE TO PROVIDE**
23 **TELECOMMUNICATIONS SERVICE PROPERLY AND CONTINUOUSLY?**

24 A: Yes.

1 **Q: IS THE COMPANY WILLING AND ABLE TO CONFORM TO THE**
2 **CONSTITUTION AND LAWS OF THE STATE OF SOUTH CAROLINA AND**
3 **TO THE RULES AND REGULATIONS OF THE COMMISSION, UNLESS**
4 **APPLICATION OF SUCH RULES OR REGULATIONS IS SPECIFICALLY**
5 **WAIVED BY THE COMMISSION?**

6 A: Yes.

7 **Q: WILL THE COMPANY FILE ALL APPLICABLE REPORTS AS REQUIRED BY**
8 **THE COMMISSION?**

9 A: Yes. The Company is aware of the Commission's requirements that all
10 telecommunications carriers file a report on South Carolina operations, a gross receipts
11 report, and a universal service contribution report on an annual basis.

12 **Q: DOES THE APPLICANT POSSESS THE MANAGERIAL AND TECHNICAL**
13 **QUALIFICATIONS, EXPERIENCE AND PERSONNEL TO PROVIDE THE**
14 **PROPOSED PUBLIC TELECOMMUNICATIONS SERVICES?**

15 A: Yes. As evidenced by the Management Profiles submitted as Exhibit C to the original
16 application, the Company has sufficient managerial and technical expertise.

17 **Q: DOES THIS COMPLETE YOUR TESTIMONY IN SUPPORT OF YOUR**
18 **APPLICATION?**

19 A: Yes.

20 **Q: WILL YOU REMAIN AVAILABLE TO RESPOND TO ANY ADDITIONAL**
21 **QUESTIONS FROM THE COMMISSION OR ITS STAFF REGARDING YOUR**
22 **APPLICATION IF NECESSARY?**

23 A: Yes.